

Federal Defenders OF NEW YORK, INC.

Southern District
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David E. Patton
Executive Director

BY ECF

Honorable Vincent L. Briccetti
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: **United States v. Elijah Wilson**
19 Cr. 685 (VB)

Dear Judge Briccetti,

I write to respectfully request that the Court modify Mr. Wilson's conditions of release to allow him to travel to the Northern District of Georgia and points in between for travel. Mr. Wilson wishes to spend time with his mother, Krystal Wilson, and his four younger siblings, age's sixteen to four as, well as his grandparents, aunts, uncles, and cousins who live in the area. Mr. Wilson has daily contact with his mother through phone calls, text messages, and video calls but has not seen her in person in well over a year. Specifically, Mr. Wilson wishes to visit from November 18-25, 2020. Mr. Wilson would stay with his mother and siblings who, reside at 3564 Hopkins Court, Powder Springs, Georgia 30127. Mr. Wilson would travel by car with his fiancé and plans to spend nearly all of his visit inside the family home. This trip would not interfere with his current employment at a local auto body shop.

Mr. Wilson was arrested and presented on July 10, 2019, Magistrate Judge Lisa Margaret Smith imposed bail conditions, including: \$200,000 PRB; 3 FRP'S; Travel Limited to SDNY/EDNY; Pretrial Supervision as Directed by PTS; Home Detention; GPS. Mr. Wilson was ordered detained until all conditions are met. After meeting all conditions Mr. Wilson was released to reside with his aunt Jennifer Wilson in Spring Valley, NY. The conditions of GPS monitoring and home detention were removed on December 19, 2020. Mr. Wilson has been on pretrial supervision for well over a year without incident.

Pretrial Services by Officer Andrew Abbot has no objection to this request. The government by Assistant United States Attorneys James Ligtenberg and Benjamin Gianforti oppose this request.

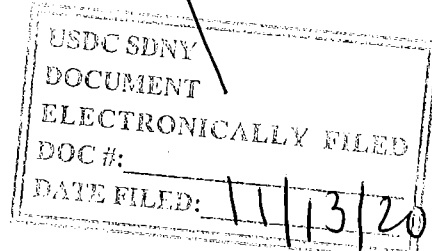
APPLICATION GRANTED:

Having reviewed this letter application, the government's opposition thereto, and the underlying record, the Court concludes that defendant's request to travel to and from Georgia from 11/18 to 11/25/2020 is reasonable and that the risk of flight and potential danger to the community by permitting the requested travel are minimal, especially in light of defendant's history of complying with the conditions of pretrial release, and his understandable desire to spend time with his family. **Mr Wilson is directed to call his pretrial services officer every day while he out of the district.** Mr. Wilson is also warned that the consequences of violating the Court's trust will be severe and immediate.

SO ORDERED:



Vincent L. Briccetti, U.S.D.J. 11/13/2020

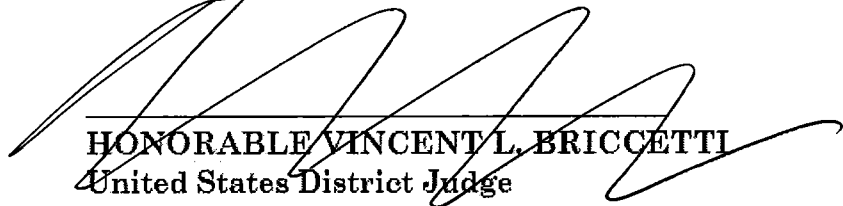


Thank you for your consideration.

Respectfully submitted,
/s/
Mark Gombiner
Attorney for Mr. Wilson
(212) 417-8718

cc: Benjamin Gianforti and James Ligtenberg, Assistant United States Attorneys
Andrew Abbot, Pretrial Services Officer

SO ORDERED:



HONORABLE VINCENT L. BRICCETTI
United States District Judge